

# **EXHIBIT 1**

**Plaintiffs' More Definite Statement as to  
Defendant Kalia Foreign Exchange**

1. Plaintiffs hereby incorporate all allegations and counts contained in the Third Amended Complaint in Burnett, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC), 03 CV 5738 & 03 CV 9849; World Trade Center Properties LLC, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC); 04 CV 7280 (RCC); and Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC); 04 CV 7279 (RCC), including all of the allegations and claims contained therein.

***Organizational Structure and Purpose of Kalia Foreign Exchange***

2. Khanani & Kalia International (Pvt.) Ltd. ("Kalia Group"), headquartered in Karachi, Pakistan, is a foreign currency exchange company conducting business in the United States under the name "Kalia & Khanani Int Inc," through offices located in Las Vegas, Nevada at the following address: 1623 Fremont Street, Las Vegas, Nevada 89101.

3. Kalia Group's corporate headquarters are located at the following address in Karachi, Pakistan: Suite # 1101-1105, 11<sup>th</sup> Floor, Block-A, Saima Trade Tower I. I. Chundrigar Road, Karachi-74200.

4. Kalia Group is currently running the following projects other than Khanani and Kalia International (Pvt.) Ltd.: Kalia & Sons, Kalia Corporation, Ko-ordination Group, (KRG), Kalia Security Vault (Pvt.) Ltd., Kalsoft (Pvt.) Ltd., KalPoint.com, Live Securities (Pvt.) Ltd., Business Relations Network ("BRN," the marketing and promotions arm of Kalia Group).

5. Kalia Group is one of the largest exchange houses and hawala dealers in the Muslim world, has shipped funds through Dubai, United Arab Emirates (UAE) and is being investigated by Pakistani authorities as of 2003.

6. Local Pakistani banking officials say that from August 2001 to May 2003, 429 reports of suspicious transactions were filed in Pakistan and sent abroad – largely to Canada, Switzerland, Britain, the United States, Portugal, Italy and Luxemburg.

7. Kalia Group is Pakistan's largest licensed chain of moneychangers.

8. Hanif S. Kalia, Chairman of KalSoft (Pvt) Ltd., and Khurram H. Kalia, Director of Software Development at KalSoft (Pvt) Ltd., attended an Information Technology show from November 13-17, 2000 in Las Vegas, Nevada, United States.

***Kalia Group's Correspondent Entities in the United States***

9. Kalia Group facilitates the transit of money to Pakistan via correspondent entities located in various countries, including the United States.

10. "Al-Habib Enterprise," is a Kalia Group correspondent entity in the U.S., located in Jersey City, New Jersey, at the following address: 107 Christopher Columbus Drive, Jersey City, New Jersey 07302.

11. "S. Noorani International Inc." is a Kalia Group correspondent entity in the U.S., located in Carrollton, Texas at the following address: 1205 West Trinity Mills Road Suite # 200 B., Carrollton, Texas, 75006.

12. "Zoha Inc" is a Kalia Group correspondent entity in the U.S., located in Jersey City, New Jersey, at the following address: 291 Grove Street, 1<sup>st</sup> Floor, Jersey City, New Jersey 07302-3650.

13. "U.J.A. Inc. – International Money Remitters" is a Kalia Group correspondent entity in the U.S., located in Jersey City, New Jersey, at the following address: 285 Grove Street, Jersey City, New Jersey 07302.

14. "Choice Money Transfer" is a Kalia Group correspondent entity in the U.S.,

located in New York City, at the following address: 350 Fifth Avenue, Empire State Building, Suite # 1016, New York, New York 10118.

15. “Placid NK Corporation” is a Kalia Group correspondent entity, located in Astoria, New York, at the following address: 30-12 30<sup>th</sup> Avenue, Suite 220 Astoria, New York, 11102.